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Comments to

Docket No. FAA-1999-5836; - 34

Notice No. 99-09



DaimlerChrysler Aerospace

MTU Maintenance Hannover

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9145.5 Certification and operations specifications requirements

(d) Operations Specifications issued to each certificated repair station contain the following:

(5) The air carrier's geographic authorization for repair stations located outside of the United States; and

Comment:

Delete paragraph (d)(5) entirely:

This information should be entered on the air carrier's operations specifications and not on the repair stations operations specifications. As this only applies to repair stations located outside the United States it is discriminatory. Furthermore, this requirement raises the spectre of bills similar to H.R. 145 and S. 1089.

§ 145.51 Application for certificate.

(a)(6) A list of the maintenance functions to be performed for the repair station, under contract, by another repair organization/facility under § 145.213.

Comment:

Revise paragraph to read:

(6) A list (or a reference to a controlled list) of the maintenance functions to be performed for the repair station, under contract, by another repair organization/facility under § 145.213.

Allowing reference to a list would further FAA/JAA harmonization. JAR 145.70 reads in part:

"(1 5) A list of contracted JAR-145 approved maintenance organisations if appropriate.

(b) The information specified in sub-paragraphs (5) and (11) to (15) inclusive, whilst a part of the maintenance organisation exposition, may be kept as separate documents or on separate electronic data files subject to the

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management part of said exposition containing a clear cross reference to such documents or electronic data files.]

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§ 145.59 Ratings and classes.

(h) Limited ratings. Whenever deemed appropriate by the Administrator, a repair station may be issued a limited rating for the performance of maintenance, preventive maintenance, or alterations of a particular make and model, or part thereof, of any of the following articles:

- (1) Aircraft,
- (2) Airframes,
- (3) Powerplants,
- (4) Propellers,
- (5) Avionics equipment,
- (6) Computer systems,
- (7) Instruments, and
- (8) Accessories.

Comment:

Delete paragraph (h) entirely. Under new §145.203 Capability List, the repair station must conduct a self-evaluation in accordance with 5145.207 before adding an article to the capability list. This must be documented and signed by the Accountable Manager. The Capability List therefore fills the requirements of the 'Limited Ratings' and the paragraph is superfluous.

§ 145.103 Facility and housing requirements.

(c) A certificated repair station may temporarily transport material, equipment, and technical personnel that are necessary to perform maintenance, preventive maintenance, alteration, or a certain specialized service on an aircraft at a place other than that repair station's fixed location, if the following requirements are met:

- (1) The work is necessary due to a special circumstance, for example, aircraft on ground, or preparation for a ferry flight, as determined by the Administrator; and
- (2) The repair station's manual includes the manner and procedures for accomplishing maintenance, preventive maintenance, alteration, or a specialized service at a place other than the repair station's fixed location.

Comment:

Delete proposed §145.103 (c) in completely. Retain wording in old §145.51(d). The requirements in proposed §145.103 (c) are too restrictive and do not make any allowances for contractual arrangements between operators and repair stations.

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§ 145.201 Quality assurance and quality control systems.

- (c) Each certificated repair station must possess all current manufacturers' maintenance manuals relating to an article when that repair station performs maintenance or alteration on the article.

Comment:

Revise paragraph to read:

- (c) Each certificated repair station must possess all current manufacturers' maintenance manuals or other appropriate approved data relating to an article when that repair station performs maintenance or alteration on the article.

The paragraph as proposed does not take into account the sentiments expressed in the Section-by-Section Analysis of the rules. It also places an extra burden on repair stations who have developed "FAA-DER repairs" as an alternative to licensing agreements by requiring them to make such agreements and obtain the manufacturers manuals.

§ 145.207 Repair station manual contents.

- (h) A list of the maintenance functions contracted to an outside facility with:
- (1) The name of the facility;
 - (2) The type of certificate and ratings, if any, held by such facility; and
 - (3) Procedures for qualifying and surveilling the facility and for accepting maintenance, preventive maintenance, or alterations performed by the facility;

Comment:

Revise to read:

- (h) A list (or reference to a list) of the maintenance functions contracted to an outside facility with:

Allowing reference to a list would further FAA/JAA harmonization. JAR 145.70 reads in part:

"(1 5) A list of contracted JAR-145 approved maintenance organisations if appropriate.

(b) The information specified in sub-paragraphs (5) and (11) to (15) inclusive, whilst a part of the maintenance organisation exposition, may be kept as separate documents or on separate electronic data files subject to the

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management part of said exposition containing a clear cross reference to such documents or electronic data files.]

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§ 145.207 Repair station manual contents.

(k) The repair station's capability list;

Comment:

Revise to read:

(k) The repair station's capability list (or reference to it);

As the capability list is controlled by the FAA under new §145.203 inclusion of the capability list in the repair station is considered to be superfluous. Inclusion of the capability list in the repair station manual would cause the manual to be revised at each revision to the capability list. Furthermore, the capability list can be extensive for repair stations which handle a broad spectrum of parts. The choice of whether to include the capability list in the manual should be left to the individual repair station.

§ 145.213 Contract maintenance.

(c) A certificated repair station may not contract the maintenance, preventive maintenance, or alteration of a complete type-certificated product, and it may not provide only approval for return to service of any article following contract maintenance.

Comment:

Revise paragraph to read:

(c) A certificated repair station may not provide only approval for return to service of any article following contract maintenance.

Reason: This paragraph is too restrictive. For example: A repair station which has the contract for complete aircraft overhaul/maintenance, but which does not have the necessary approvals/facilities for engine maintenance/overhaul is prevented from subcontracting the complete engine overhaul/maintenance to a facility which has the necessary approvals, etc.